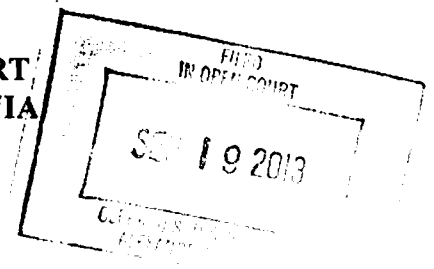


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**



UNITED STATES OF AMERICA,

v.

ERIC HARROUN,

Defendant.

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Case No. 1:13-cr-369

**MOTION TO WAIVE PRESENTENCE REPORT AND FOR IMMEDIATE
SENTENCING**

COMES NOW the defendant, Eric Harroun, by counsel, pursuant to Federal Rule of Criminal Procedure 32(c), and requests that the Court waive a presentence report and conduct a sentencing hearing following acceptance of a plea in this case.

1. Mr. Harroun has been in custody since March 28, 2013.
2. Pursuant to the plea agreement entered into by the parties, Mr. Harroun has entered a guilty plea to the offense of conspiracy to provide defense articles and services in violation of 18 U.S.C. § 371 and 22 U.S.C. § 2778.
3. Mr. Harroun falls within criminal history category II based upon convictions arising from driving under the influence offenses in 2005 and 2009. The applicable sentencing guideline is U.S.S.G. § 2M5.2. However, the government will file a motion for a reduction in sentence pursuant to U.S.S.G. § 5K1.1 based upon Mr. Harroun's substantial assistance both prior to and subsequent to the prosecution in this matter.
4. The parties have jointly recommended a sentence of time served. In addition, based upon the record and additional information supplied by the parties, the Court has sufficient

information to exercise its sentencing authority under 18 U.S.C. § 3553.

5. Accordingly, Mr. Harroun respectfully asks the Court to waive the presentence report and conduct an immediate sentencing hearing in this matter following acceptance of the defendant's guilty plea.

Respectfully submitted,
ERIC HARROUN

By Counsel,

Michael S. Nachmanoff,
Federal Public Defender

By: 
Jeremy C. Kamens

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of September 2013, I will file the foregoing by hand in open court, and provide a copy to the following:

Carter Burwell, Esquire
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314

A handwritten signature in black ink, appearing to read 'Jeremy C. Kamens', is written over a horizontal line.

Jeremy C. Kamens
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